

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

x

LUKE RICHARDSON,

Plaintiff,

-against-

THE CITY OF NEW YORK, a municipal entity,
et al.,

Defendants.

**DECLARATION OF JOY
ANAKHU IN SUPPORT OF
DEFENDANTS' MOTION TO
DISMISS**

15 CV 5775 (PKC)

x

Joy T. Anakhu, declares under penalty of perjury and pursuant to 28 U.S.C. § 1746,
that the following is true and correct:

1. I am a Senior Counsel in the Office of Zachary Carter, Corporation Counsel of the City of New York, attorney for defendants. As such, I am familiar with the facts stated below. I submit this declaration in support of defendants' motion for dismissal pursuant to Rule 12 of the Federal Rules of Civil Procedure.

2. Plaintiff brought this action by filing a complaint on July 22, 2015. Subsequently plaintiff amended his complaint on September 17, 2015. Attached as Exhibit A is plaintiff's amended complaint. In a forty three page complaint plaintiff raises five claims for relief: false arrest, Ex A, pp. 19-20, excessive force, Ex A, pp. 20-21, failure to intervene, Ex A, pp. 21, a vaguely described claim for deprivation of rights under § 1983, Ex A, pp. 18-19, and a municipal liability theory that sounds chiefly in deliberate indifference, Ex A, pp. 22-42.

Dated: New York, New York
January 29, 2016

ZACHARY CARTER
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By: /s/
Joy Anakhu
Senior Counsel
New York City Law Department

TO:

Honorable P. Kevin Castel
United States District Judge
500 Pearl Street
New York, New York 10007

David Thompson
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